

HANSKI PARTNERS LLC

85 Delancey Street
New York, New York 10002
Phone: 212.248.7400

April 29, 2025

Via ECF

The Honorable Katherine Polk Failla
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *Motion to Adjourn Initial Pretrial Conference*
Carlos Ruiz v BigOld Enterprises, LLC; 1:25-cv-00838 (KPF)

Dear Judge Failla:

Hanski Partners represents plaintiff Carlos Ruiz in the above-entitled action. We write to respectfully ask the Court to (i) adjourn the May 9, 2025 initial pretrial conference to a date in June 2025 convenient for the Court; and (ii) similarly extend the parties' deadline to file the proposed civil case management plan and joint letter which are due in advance of the conference. The reason for this request is because the defendant has not yet appeared in this action. However, Mr. Joseph Purifico, who has held himself out to be general counsel for the defendant, advised the undersigned counsel, by email dated April 28, 2025, that he is "in the process of retaining New York Counsel".

Thank you for your time and attention to this matter.

Respectfully submitted,

/s/
Robert G. Hanski, Esq.

Application GRANTED. The initial pretrial conference previously scheduled for May 9, 2025, is hereby ADJOURNED to **June 12, 2025**, at **12:00 p.m.** The deadline to file a proposed case management plan and joint letter is likewise ADJOURNED to the Thursday prior to this conference.

The Clerk of Court is directed to terminate the pending motion at docket entry 7.

Dated: April 30, 2025
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE